

CMS Manual System	Department of Health & Human Services (DHHS)
Pub 100-20 One-Time Notification	Centers for Medicare & Medicaid Services (CMS)
Transmittal 2195	Date: November 9, 2018
	Change Request 11002

SUBJECT: Analysis to Discuss and Resolve the Challenges Around the Design of (Pre-/Post-Pay) Electronic Medical Documentation Requests (eMDR) via the Electronic Submission of Medical Documentation (esMD) System

I. SUMMARY OF CHANGES: The purpose of this CR is to analyze and resolve the issues each RC is facing to implement eMDR to registered Providers via esMD.

EFFECTIVE DATE: April 1, 2019

**Unless otherwise specified, the effective date is the date of service.*

IMPLEMENTATION DATE: April 1, 2019

Disclaimer for manual changes only: The revision date and transmittal number apply only to red italicized material. Any other material was previously published and remains unchanged. However, if this revision contains a table of contents, you will receive the new/revised information only, and not the entire table of contents.

II. CHANGES IN MANUAL INSTRUCTIONS: (N/A if manual is not updated)

R=REVISED, N=NEW, D=DELETED-Only One Per Row.

R/N/D	CHAPTER / SECTION / SUBSECTION / TITLE
N/A	N/A

III. FUNDING:

For Medicare Administrative Contractors (MACs):

The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

IV. ATTACHMENTS:

One Time Notification

Attachment - One-Time Notification

Pub. 100-20	Transmittal: 2195	Date: November 9, 2018	Change Request: 11002
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SUBJECT: Analysis to Discuss and Resolve the Challenges Around the Design of (Pre-/Post-Pay) Electronic Medical Documentation Requests (eMDR) via the Electronic Submission of Medical Documentation (esMD) System

EFFECTIVE DATE: April 1, 2019

**Unless otherwise specified, the effective date is the date of service.*

IMPLEMENTATION DATE: April 1, 2019

I. GENERAL INFORMATION

A. Background: There have been several requests from Medicare providers to the Centers for Medicare & Medicaid Services (CMS) to enable the functionality to send Additional Documentation Request (ADR) letters electronically. CMS implemented a pilot supporting the electronic version of the ADR letter known as Electronic Medical Documentation Request (eMDR) via the Electronic Submission of Medical Documentation (esMD) system. Since the eMDRs may contain Protected Health Information (PHI) data being sent to the prospective provider, a valid consent form is required from the authorized individual representing the provider along with the destination details including any delegation to their associated or representing organizations such as Health Information Handlers (HIHs).

CMS is requiring its review contractors to support sending ADR (Pre-Pay / Post-Pay) letters electronically as eMDRs. CMS is looking forward to implementing the solution to send ADR (Pre and Post Pay) letters electronically by the July 2019 release. The Payment Error Rate Measurement contractors are exempted from this mandate. The Comprehensive Error Rate Testing (CERT) contractors and the Quality Improvement Organizations (QIO) can opt to participate in the eMDR process.

The purpose of this CR is to analyze and resolve the challenges that the contractors (review contractors for Post-Pay and the SSM/MACs for Pre-Pay) are facing, to implement eMDRs to registered providers via the esMD system.

Pre-Pay - A set of 10 calls shall be scheduled between the SSMs and MACs to discuss the design and business requirements for Pre-Pay eMDR implementation.

Post-Pay - A set of (up to) 4 calls shall be scheduled with each review contractor to come up with the requirements for Post-Pay eMDR implementation.

Assumptions:

- A provider (by billing NPI) registering for the first time to receive eMDR shall receive both electronically and by postal mail for the first three ADRs.
- A provider enrollment for MAC portals and DDE (Part A) are separate from eMDR enrollment and registration.
- A provider (by billing NPI) registering for eMDR will receive ADR letters electronically via esMD from all review contractors sending out ADR letters.
- A provider (by billing NPI) registering for eMDR is applicable to receive eMDRs for all its Provider Transaction Access Numbers (PTANs)
- A provider registering to receive eMDR shall also be automatically registered to receive ADR summary letters (educational letters) electronically via esMD.

B. Policy: The Administrative Simplification provisions of Health Insurance Portability and Accountability Act (HIPAA) require the Secretary of the Department of Health and Human Services (HHS) to adopt standard electronic transactions and code sets for administrative health care transactions. The Secretary may also modify these standards periodically.

II. BUSINESS REQUIREMENTS TABLE

"Shall" denotes a mandatory requirement, and "should" denotes an optional requirement.

Number	Requirement	Responsibility									
		A/B MAC			D M E M A C S	Shared-System Maintainers				Other	
		A	B	H H H		F I S S	M C S	V M S	C W F		
11002.1	<p>The contractors shall participate in the one-hour calls scheduled to discuss the process steps (for Post-Pay eMDRs) and to come up with requirements to implement eMDR via esMD.</p> <p>NOTES:</p> <ul style="list-style-type: none"> Each contractor shall participate in the one-hour calls based on the challenges that they are facing to implement eMDR. The first call is common for all the contractors where the esMD team shall discuss the approach, call schedule and topics that will be covered. Please check the call schedule attached to the CR. Subsequent calls shall be scheduled with each organization covering all their respective jurisdictions/regions/zones. For example, call #2 shall be scheduled for all the AdvanceMed contracts. If additional calls are required, then a separate call shall be scheduled for each contract. The goal is to come up with the Implementation Business Requirements (BRs) of the Post-Pay eMDR process, for the July 2019 release. <p>The CERT and QIO contractors may choose to participate in the calls. For both the CERT and QIO contractors, participating in the eMDR related processes is optional.</p>	X	X	X	X						CERT, QIO, RAC, RRB-SMAC, SMRC, UPICs, esMD
11002.1.1	<p>For the Post-Pay design analysis calls, each contractor shall take the meeting minutes that shall be posted under the 'Analysis Call Documents' tab in eChimp within two (2) business days after each call.</p> <p>NOTE: The CERT and QIO contractors may choose to</p>	X	X	X	X						CERT, QIO, RAC, RRB-SMAC, SMRC, UPICs

Number	Requirement	Responsibility								Other
		A/B MAC			D M E M A C	Shared-System Maintainers				
		A	B	H H H		F I S S	M C S	V M S	C W F	
	participate in the calls. For both the CERT and QIO contractors, participating in the eMDR related processes is optional.									
11002.2	The SSMs and contractors shall attend the 10 one-hour calls to discuss the design of the Pre-Pay eMDR process. NOTES: <ul style="list-style-type: none"> The goal is to come up with the Implementation BRs (of the Pre-Pay eMDR process) for the July 2019 release. The schedule of the calls shall be shared with the point of contacts of each contractor. 	X	X	X	X	X	X	X		esMD
11002.2.1	For the Pre-Pay design analysis calls, the respective SSMs shall take the meeting minutes corresponding to their process changes and shall post under the 'Analysis Call Documents' tab in eChimp within two (2) business days after each call.					X	X	X		
11002.3	The contractors and SSMs shall provide the contact names and email addresses for the analysis calls to CMS at esMDBusinessOwners@cms.hhs.gov within five (5) business days of the issuance of this CR. NOTE: The CERT and QIO contractors may choose to participate in the calls. For both the CERT and QIO contractors, participating in the eMDR related processes is optional.	X	X	X	X	X	X	X		CERT, QIO, RAC, RRB-SMAC, SMRC, UPICs

III. PROVIDER EDUCATION TABLE

Number	Requirement	Responsibility				
		A/B MAC			D M E M A C	C E D I
		A	B	H H H		
	None					

IV. SUPPORTING INFORMATION

Section A: Recommendations and supporting information associated with listed requirements: N/A

"Should" denotes a recommendation.

X-Ref Requirement Number	Recommendations or other supporting information:
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Section B: All other recommendations and supporting information: N/A

V. CONTACTS

Pre-Implementation Contact(s): Melanie Jones, 410-786-5461 or Melanie.Jones@cms.hhs.gov

Post-Implementation Contact(s): Contact your Contracting Officer's Representative (COR).

VI. FUNDING

Section A: For Medicare Administrative Contractors (MACs):

The Medicare Administrative Contractor is hereby advised that this constitutes technical direction as defined in your contract. CMS does not construe this as a change to the MAC Statement of Work. The contractor is not obligated to incur costs in excess of the amounts allotted in your contract unless and until specifically authorized by the Contracting Officer. If the contractor considers anything provided, as described above, to be outside the current scope of work, the contractor shall withhold performance on the part(s) in question and immediately notify the Contracting Officer, in writing or by e-mail, and request formal directions regarding continued performance requirements.

ATTACHMENTS: 1

	DATE	TIME	Contractor Attendees
<i>Call 1</i>	Tuesday, November 6, 2018	11 am or 1 pm	All MACs, SSMs
<i>Call 2</i>	Thursday, November 8, 2018	1 PM or 2 pm	All MACs, SSMs
<i>Call 3</i>	Friday, November 16, 2018	2.30 pm to 3.30 pm	All MACs, SSMs
<i>Call 4</i>	Tuesday, November 20, 2018	1:00 PM	All MACs, SSMs
<i>Call 5</i>	Tuesday, November 27, 2018	1:00 PM	All MACs, SSMs
<i>Call 6</i>	Friday, November 30, 2018	10am or 1pm	All MACs, SSMs
<i>Call 7</i>	Tuesday, December 11, 2018	1pm	All MACs, SSMs
<i>Call 8</i>	Tuesday, December 18, 2018	1:00 PM	All MACs, SSMs
<i>Call 9</i>	TBD		
<i>Call 10</i>	TBD		

esMD Attendees

PCG, DATS, DPSS

Organization	Org Code / Sequence
AdvanceMed	ORG 1
CGS Administrators	ORG 2
Palmetto GBA	ORG 3
Noridian Healthcare Solutions	ORG 4
Kepro	ORG 5
Livanta	ORG 6
SafeGuard Services (SGS)	ORG 7
Wisconsin Physicians Service	ORG 8
Novitas Solutions	ORG 9
National Government Services	ORG 10
Performant Recovery	ORG 11
Cotiviti	ORG 12
Qlarant Integrity Solutions	ORG 13
CNI (A+ Government Solutions)	ORG 14
First Coast Service Options	ORG 15
HMS Federal Solutions	ORG 16
Health Integrity	ORG 17

o	Contract (Jurisdiction)	Organization
1	MAC JA	Noridian Healthcare Solutions
2	MAC JB	CGS Administrators
3	MAC JC	CGS Administrators
4	MAC JD	Noridian Healthcare Solutions
5	MAC J5	Wisconsin Physicians Service
6	MAC J6 and (HH+H)	National Government Services
7	MAC J8	Wisconsin Physicians Service
8	MAC J15 and (HH+H)	CGS Administrators
9	MAC JE	Noridian Healthcare Solutions
10	MAC JF	Noridian Healthcare Solutions
11	MAC JH	Novitas Solutions
12	MAC JJ	Palmetto GBA
13	MAC JK and (HH+H)	National Government Services (NGS)
14	MAC JL	Novitas Solutions
15	MAC JM and (HH+H)	Palmetto GBA
16	MAC JN	First Coast Service Options
17	RAC Region 1	Performant Recovery
18	RAC Region 2	Cotiviti
19	RAC Region 3	Cotiviti
20	RAC Region 4	HMS Federal Solutions
21	RAC Region 5	Performant Recovery
22	UPIC Western	Qlarant Integrity Solutions
23	UPIC Mid-Western	AdvanceMed
24	UPIC South-Western	Qlarant Integrity Solutions
25	UPIC North-Eastern	SafeGuard Services (SGS)
26	UPIC South-Eastern	SafeGuard Services (SGS)
27	QIO Area 1	Livanta
28	QIO Area 2	Kepro
29	QIO Area 3	Kepro
30	QIO Area 4	Kepro
31	QIO Area 5	Livanta
32	CERT Review Contractor (RC)	AdvanceMed
33	SMRC	Noridian Healthcare Solutions
34	RRB	Palmetto GBA

Call # by Org	Org Name	Date	Time
1	Advance Med	Thursday, November 8, 2018	10 to 11 am
1	CGS Administrators	Friday, November 9, 2018	10 to 11 am
1	Palmetto GBA	Friday, November 9, 2018	1 to 2 pm
1	Kepro	Tuesday, November 13, 2018	11.30 to 12.30 PM
1	Livanta	Wednesday, November 14, 2018	1 to 2 pm
1	SafeGuard Services (SGS)	Thursday, November 15, 2018	10 to 11 am
1	Wisconsin Physicians Service	Thursday, November 15, 2018	2:30 to 3:30 pm
1	Novitas Solutions	Friday, November 16, 2018	1 to 2 pm
1	National Government Services	Friday, November 16, 2018	10 to 11 am
1	Performant Recovery	Monday, November 19, 2018	1 to 2 pm
1	Cotiviti	Monday, November 19, 2018	10 to 11 am
1	Qlarant Integrity Solutions	Wednesday, November 21, 2018	1 to 2 pm
1	First Coast Service Options	Monday, November 26, 2018	10 to 11 am
1	HMS Federal Solutions	Monday, November 26, 2018	1 to 2 pm
1	Noridian Healthcare Solutions	Wednesday, November 28, 2018	10 to 11 am
2	Advance Med	Monday, December 3, 2018	10 to 11 am
2	CGS Administrators	Wednesday, December 5, 2018	10 to 11 am
2	Palmetto GBA	Wednesday, December 5, 2018	1 to 2 pm
2	Noridian Healthcare Solutions	Thursday, December 6, 2018	10 to 11 am
2	Kepro	Friday, December 7, 2018	10 to 11 am
2	Livanta	Friday, December 7, 2018	1 to 2 pm
2	SafeGuard Services (SGS)	Monday, December 10, 2018	10 to 11 am
2	Wisconsin Physicians Service	Monday, December 10, 2018	1 to 2 pm
2	Novitas Solutions	Wednesday, December 12, 2018	1 to 2 pm
2	National Government Services	Wednesday, December 12, 2018	10 to 11 am
2	Performant Recovery	Friday, December 14, 2018	1 to 2 pm
2	Cotiviti	Friday, December 14, 2018	10 to 11 am
2	Qlarant Integrity Solutions	Monday, December 17, 2018	1 to 2 pm
2	CNI (A+ Government Solutions)	Monday, December 17, 2018	10 to 11 am
2	First Coast Service Options	Wednesday, December 19, 2018	10 to 11 am
2	HMS Federal Solutions	Wednesday, December 19, 2018	1 to 2 pm
3	Advance Med	Thursday, January 3, 2019	10 to 11 am
3	CGS Administrators	Friday, January 4, 2019	10 to 11 am
3	Palmetto GBA	Friday, January 4, 2019	1 to 2 pm
3	Noridian Healthcare Solutions	Monday, January 7, 2019	10 to 11 am
3	Kepro	Monday, January 7, 2019	1 to 2 pm
3	Livanta	Tuesday, January 8, 2019	2.30 to 3:30 pm
3	SafeGuard Services (SGS)	Thursday, January 10, 2019	10 to 11 am
3	Wisconsin Physicians Service	Friday, January 11, 2019	10 to 11 am
3	Novitas Solutions	Friday, January 11, 2019	1 to 2 pm
3	National Government Services	Monday, January 14, 2019	10 to 11 am
3	Performant Recovery	Monday, January 14, 2019	1 to 2 pm
3	Cotiviti	Tuesday, January 15, 2019	10 to 11 am
3	Qlarant Integrity Solutions	Thursday, January 17, 2019	10 to 11 am
3	CNI (A+ Government Solutions)	Friday, January 18, 2019	10 to 11 am
3	First Coast Service Options	Monday, January 21, 2019	10 to 11 am

Topics	Audience	Meeting Count on Same day
	Advance Med; CMS; esMD	1
	CGS Admin; CMS; esMD	2
	Palmetto; CMS; esMD	2
	Kepro	1
	Livanta	1
	Safeguard Sevices; CMS; esMD	2
	WPS; CMS; esMD	2
	Novitas; CMS; esMD	2
	NGS; CMS; esMD	2
	Performant Recovery; CMS; esMD	2
	Cotiviti; CMS; esMD	2
	QIS; CMS; esMD	2
	First Coast Service Options; CMS; esMD	2
	HMS Federal; CMS; esMD	2
	Noridian	1
	Advance Med; CMS; esMD	1
	CGS Admin; CMS; esMD	2
	Palmetto; CMS; esMD	2
	Noridian	1
	Kepro	2
	Livanta	2
	Safeguard Sevices; CMS; esMD	2
	WPS; CMS; esMD	2
	Novitas; CMS; esMD	2
	NGS; CMS; esMD	2
	Performant Recovery; CMS; esMD	2
	Cotiviti; CMS; esMD	2
	QIS; CMS; esMD	2
	CNI (A+ GS); CMS; esMD	2
	First Coast Service Options; CMS; esMD	2
	HMS Federal; CMS; esMD	2
	Advance Med; CMS; esMD	1
	CGS Admin; CMS; esMD	2
	Palmetto; CMS; esMD	2
	Noridian	2
	Kepro	2
	Livanta	1
	Safeguard Sevices; CMS; esMD	1
	WPS; CMS; esMD	2
	Novitas; CMS; esMD	2
	NGS; CMS; esMD	2
	Performant Recovery; CMS; esMD	2
	Cotiviti; CMS; esMD	1
	QIS; CMS; esMD	1
	CNI (A+ GS); CMS; esMD	1
	First Coast Service Options; CMS; esMD	2

